

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Accessibility of User Interfaces, and Video	)	
Programming Guides and Menus	)	Docket No. 12-108
	)	
	)	
	)	

**HONDA MOTOR CO., LTD. STATUS REPORT**

**I. Introduction**

On March 16, 2017, the Federal Communications Commission issued a Memorandum and Order (Order) granting Honda Motor Co., Ltd.'s (Honda's) December 20, 2016 request for a limited waiver of the Commission's rules requiring the accessibility of user interfaces on covered digital apparatus for certain Honda vehicles — model years 2017 through 2019 of the Honda Pilot, Honda Odyssey, and Acura MDX. The waiver is subject to the requirement that Honda, on July 20, 2017 and January 20, 2018, provide the Media Bureau and the Consumer and Government Affairs Bureau status reports on Honda's efforts to develop and integrate accessible technology for rear entertainment systems in the vehicles covered by the waiver. As required on page 5 of the Order, this initial report includes the following items:

- A description of how Honda plans to make appropriate functions on rear entertainment systems accessible to individuals who are blind or visually impaired;
- A description of how Honda plans to make built-in video description and closed captioning functions accessible through a mechanism reasonably comparable to a button, key, or icon;
- A review of information about Honda's progress toward meeting all applicable accessibility obligations; and
- A detailed plan and timeline for achieving full compliance during the waiver period.

## II. Description of How Honda Plans to Make Appropriate Functions Accessible to Individuals Who are Blind or Visually Impaired

In order to explain Honda's plans for making the Rear Entertainment System (RES) accessible, it is essential to understand the components of the system and how it operates. The following illustration shows the different pieces that together comprise the RES.



The RES is a video display system that allows second and third row passengers to enjoy video content on a roof-mounted drop-down display, positioned on the ceiling just behind the first row passenger seats. Using the RES, second and third row passengers can enjoy content through the Blu-ray/DVD player, USB video/audio input, media servers video/audio input, and HDMI input. In addition, in some models passengers can enjoy streaming video content via embedded applications, as well as through using Honda's own "How Much Farther" application that provides distance remaining and other information to passengers during a Navigation route. Passengers listen to the RES audio through one of two sets of wireless infrared headphones

included with the system, or via personal headphones plugged into one of two headphone jacks. Passengers navigate the system with an infrared remote control.

Passenger control of RES functions is accomplished using infrared technology. An infrared remote control sends commands to an infrared receiver in the drop-down display component, which then uses infrared transmitters to send audio to the wireless headphones. Honda plans to achieve compliance with the Act's accessibility requirements by use of specific buttons on the infrared remote control, certain visual adjustments and prompts, as well as other auditory narration devices. A summary of the progress made thus far as to these specific plans is fully described below.

### **III. How Honda Plans to Make Built-In Video Description and CC Functions Accessible Through Mechanism Reasonably Comparable to a Button, Key, or Icon**

The rules implementing Section 204 of the Twenty-First Century Communications and Video Accessibility Act of 2010 (the Act) require accessibility features be designed such that they “can be activated through a mechanism that is reasonably comparable to a button, key, or icon.” 47 CFR § 79.109(a)(1)-(2). Honda plans to make the RES accessible to visually and hearing impaired passengers by making use of specific buttons on the infrared remote to turn on accessibility and its corresponding features. Documentation of how visually and hearing impaired users can activate and navigate the accessibility features described below will be included in an Owner's Guide supplied with each vehicle, as well as through manuals that are made available online. The online information will be made available in a form accessible to visually and hearing impaired users.

First, to turn on the accessibility features, a passenger will either press the “Home” key on the remote control four (4) times or select to turn on the features through the OnScreen Display menus. Upon doing so, the audio will announce through the headphones “Accessibility

Mode Active.” Once in the Accessibility Mode, a user can press any button on the remote and the audio output will announce which button has been pressed.

## *How to turn ON Accessibility*



Press Home key 4 times

“Accessibility Mode Active” Audio

Second, to turn on subtitles, a passenger will either press the “Enter” key on the remote control four (4) times or select to turn on subtitles through the OnScreen Display menus. Upon doing so, the audio will announce through the headphones “Subtitles Active.”

## *How to turn ON Subtitles*



Press Enter key 4 times

“Subtitles Active” Audio

Finally, to activate Secondary Audio (otherwise known as built in video description), a user will either press the “Back” key four (4) times or select to turn on the audio through the

OnScreen Display menus.

## *How to turn ON Secondary Audio ("Built in video description")*



Press Back key 4 times

"Secondary Audio Active" Audio

#### **IV. Information Regarding Honda's Progress Toward Meeting All Applicable Accessibility Obligations**

##### **A. Honda is On Schedule to Meet the Compliance Deadline for Both the Pilot and Odyssey.**

Honda has been diligently working to devise compliance schedules for the Pilot, Odyssey, and MDX. As to the Pilot and Odyssey, Honda is fully prepared to meet the compliance deadline by the waiver expiration date of August 20, 2018. Honda utilizes the same supplier for RES equipment used in both the Pilot and Odyssey, Supplier A (Honda does not have permission to disclose the entity name at this time). Over the last several months, Supplier A has communicated to Honda that it anticipates being able to supply Honda with the equipment necessary to achieve compliance with the Act ideally by the end of July 2018, but in any event by expiration of the waiver in August 2018.

As of July 20, 2017, Honda has completed the following stages of achieving compliance for the RES systems in the Pilot and Odyssey:

- December 2016 – February 2017: Completed hardware design investigation.

- February 2017 – March 2017: Completed full compliance requirements investigation.
- March 2017 – June 2017: Completed investigation and finalized list of required system specifications.
- June 2017 – Present: Developing software and fixing bugs.

**B. Compliance Deadline for the MDX.**

As with the Pilot and Odyssey, Honda has been diligently working to devise a compliance schedule for the MDX. Honda utilizes a different supplier for equipment used in the MDX's RES than with the other models, Supplier B (Honda does not have permission to disclose the entity name at this time). Over the past several months, i.e. after Honda submitted the December 20, 2016 waiver request, Supplier B and Honda have determined that the MDX's hardware is incapable of supporting the software changes necessary to bring the MDX RES into compliance with the Act. Furthermore, Supplier B currently does not have the requisite expertise with the necessary hardware or software to bring the MDX's RES into compliance. As a result of these deficiencies, Honda's best estimate of the earliest date that Honda could expect the MDX RES to come into compliance with the Act would be Spring of 2020, after the expiration of the current waiver. Because Honda and Supplier B still are completing a final assessment this estimate may change, and therefore Honda will update the FCC via this docket as soon as it has all the relevant facts necessary to reach a final conclusion about the MDX's RES.

As of July 20, 2017, Honda has thus far engaged in the following steps towards creating a compliant MDX RES:

- December 2016 – February 2017: Completed hardware investigation for the memory chips and processor required to support accessibility.
- February 2017 – March 2017: Completed full compliance requirements investigation.
- March 2017 – Present: Continued investigation and problem solving regarding specifications necessary for the system to support accessibility. Additional concerns identified from the supplier regarding the obstacles to implementing requisite hardware and software.

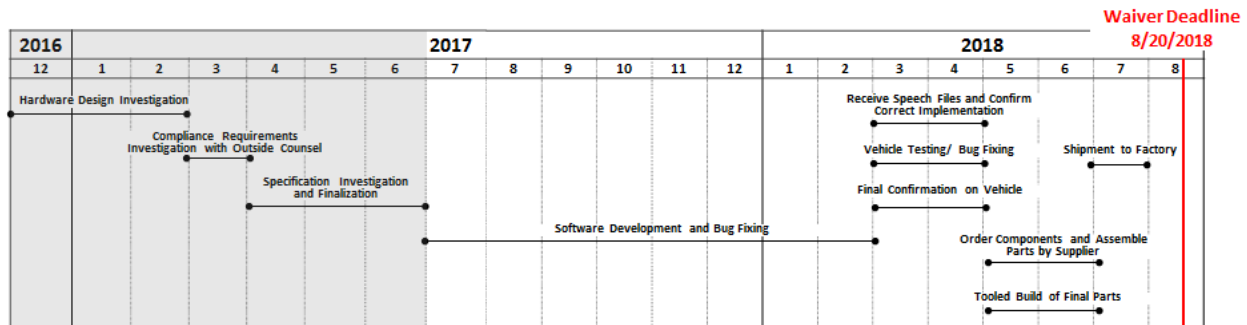
**V. Detailed Plan and Timeline for Achieving Full Compliance During the Waiver Period**

**A. Schedule to Meet Compliance Date Upon Expiration of Waiver for Pilot and Odyssey.**

As discussed above, Honda is fully on-track to meet the compliance deadline under the original waiver terms for both the Pilot and Odyssey. The following figure illustrates the steps remaining in the process to achieve compliance with the Act, and shows the approximate length of each step. In sum, Honda expects to achieve full compliance as to the RES for the Pilot and Odyssey by July 2018, before the waiver expires on August 20, 2018.

**Pilot and Odyssey Compliance Schedule**

Implementation Steps	Time Length	Completion
Hardware Design Investigation (for memory chips and processors needed for speech output to headphones)	3 months Dec 2016 – Feb 2017	Complete
Compliance Requirements Investigation with Outside Counsel	1 month Feb 2017 – Mar 2017	Complete
Specification Investigation and Finalization	3 months Mar 2017 – Jun 2017	Complete
Software Development and Bug Fixing	8 months Jun 2017 – Feb 2018	Currently On Schedule
Receive Speech Files and Confirm Correct Implementation	2 months Feb 2018 – Apr 2018	
Vehicle Testing, Including Retesting of Hand- Modified Unit & Bug Fixing		
Final Confirmation on Vehicle		
Order Components and Assemble Parts by Supplier	2 months Apr 2018 – Jun 2018	
Tooled Build of Final Parts		
Supplier Parts to Be Built and Shipment to the Factory	1 month Jun 2018 – July 2018	



## B. Schedule and Timeline to Meet Compliance Date Upon Expiration of Waiver for MDX.

As discussed above, Supplier B has communicated to Honda its inability to provide Honda with the equipment necessary to bring the MDX RES into compliance by August 20, 2018. At this time, Honda and Supplier B can only provide an educated estimate that the earliest the MDX could become compliant with the Act would be Spring 2020. That estimate accounts for both the time required for Supplier B to provide Honda with the necessary equipment and software, plus the time required for Honda to implement the new technology upon receipt from the supplier.

## VI. Conclusion

Honda has been diligently working to devise compliance schedules for the Pilot, Odyssey, and MDX. As to the Pilot and Odyssey, Honda is on track to meet the compliance deadline on or before the expiration of the waiver on August 20, 2018. Even with Honda's efforts, due to a number of technological and developmental hurdles applicable to the MDX RES, Honda's best estimate is that the earliest the MDX could come into compliance would be spring 2020. If this estimate holds after Honda and its supplier complete their assessment of the MDX RES, Honda would need to seek modification of the Commission's Order as it relates to the MDX. Honda anticipates being in a position to file an additional update regarding the MDX within 30 days.



July 20, 2017

Respectfully submitted,

/s/ Andrew Emerson

Andrew Emerson  
Porter Wright Morris & Arthur, LLP  
41 South High Street, 30th Floor  
Suites 2800-3200  
Columbus, Ohio 43215  
aemerson@porterwright.com  
Direct: 614-227-2014  
Fax: 614-227-2100  
Toll Free: 800-533-2794

*Counsel for Honda North America, Inc.*

Sent via certified mail to:

Maria Mullarkey  
Assistant Division Chief, Policy Division  
Media Bureau  
Federal Communications Commission  
Room 4-A739  
445 12th Street SW  
Washington, DC 20554

Sent via email to:

Maria Mullarkey ([Maria.Mullarkey@fcc.gov](mailto:Maria.Mullarkey@fcc.gov))  
Michelle Carey ([Michelle.Carey@fcc.gov](mailto:Michelle.Carey@fcc.gov))  
Martha Heller ([Martha.Heller@fcc.gov](mailto:Martha.Heller@fcc.gov))  
Alison Kutler ([Alison.Kutler@fcc.gov](mailto:Alison.Kutler@fcc.gov))  
Suzanne Rosen Singleton ([Suzanne.Singleton@fcc.gov](mailto:Suzanne.Singleton@fcc.gov))